28

JOHN A. VOS ESQ. (#80790) 1430 Lincoln Avenue San Rafael, CA 94901 (415) 485-5332 For interested Party John A. Vos

## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA

In re:	ROBERT O'BRIEN		)	No: 16-30152
		Debtor	)	
			)	

## REQUEST FOR SPECIAL NOTICE

TO THE DEBTOR, OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED PARTIES HEREIN:

PLEASE TAKE NOTICE that the undersigned, on behalf of an interested party of the Debtor within the meaning of 11 U.S.C. §§101(5), (10), pursuant to 11 U.S.C. §1109(b) and Rule 9010 of the Federal Rules of Bankruptcy Procedure, or an interested party or merely a party just interested in the above-captioned Chapter 13 case, hereby requests notice, including notice by facsimile if appropriate to give adequate notice in the circumstances, of all matters which may come before the Court concerning the above-named Debtor and requests that such notices be addressed as follows:

JOHN A. VOS, Attorney 1430 Lincoln Avenue San Rafael, CA 94901

This request includes, but is not limited to the following:

- 1. all notices and papers referred to in Rules 2002, 3017, 4001, 9007, 9010(b) and 9014 of the Federal Rules of Bankruptcy Procedure;
- 2. copies of all proposed plans and disclosure statements and other documents or pleadings relating to plan confirmation;
- 3. notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection or

Case: 16-30152 Doc# 16 Filed: 03/01/16 Entered: 03/01/16 10:42:01 Page 1 of 2

otherwise); and

4. copies of any other documents brought before the Court in this case, whether formal or informational, whether written or other, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise.

Neither this request for special notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct shall constitute a wavier of the within party's:

- a. right to any and all final orders in any and all non-core matters entered only after <u>de</u>
  novo review by a United States District Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation <u>vel non</u> of such matters as "core proceeding" pursuant to 28 U.S.C. § 157 (b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under agreements or at law or in equity or under the United States Constitution.

Dated: March 1, 2016 Respectfully submitted,

LAW OFFICE OF JOHN A VOS

By: John A. Vos, Esq.

6-30152 Doc# 16 Filed: 03/01/16 Entered: 03/01/16 10:42:01 Page 2 of 2